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13
14 UNITED STATES BANKRUPTCY COURT
15
16 NORTHERN DISTRICT OF CALIFORNIA
17
18 SAN FRANCISCO DIVISION

19 **In re:**

20 **PG&E CORPORATION**

21 **- and -**

22 **PACIFIC GAS AND ELECTRIC**
23 **COMPANY,**
24 **Debtors.**

- 25 ☐ Affects PG&E Corporation
26 ☐ Affects Pacific Gas and Electric
27 Company
28 ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**NOTICE OF APPEARANCE
AND REQUEST FOR SERVICE
OF DOCUMENTS**

PLEASE TAKE NOTICE that, pursuant to rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure, and sections 1102(1) and 1109(b) of title 11 of the United States Code, the undersigned attorneys appear as counsel in the above-captioned bankruptcy cases (“*Chapter 11 Cases*”) on behalf of creditors RE Mustang LLC, RE Mustang 3 LLC and RE Mustang 4 LLC (collectively, the “*Mustang Project Companies*”), and request that all notices given or required to be given in connection with the Chapter 11 Cases, and all papers served or required to be served in connection therewith, be given and served upon:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, any and all notices in respect of any application, motion, petition, pleading, request, complaint, demand, order, or any other paper filed in the Chapter 11 Cases, whether such notice is formal or informal, written or oral, and whether transmitted by hand delivery, United States Mail, electronic mail, expedited delivery service, telephone, telecopy or otherwise.

PLEASE TAKE FURTHER NOTICE that the undersigned requests that the Debtors and the Clerk of the Court place the foregoing names and addresses on any mailing matrix or list of creditors existing or to be prepared in these Chapter 11 Cases.

This Notice of Appearance and Request for Service of Documents shall not be deemed or construed to be a waiver of (i) the Mustang Project Companies' right to have final orders in non-core matters entered only after *de novo* review by a United States District Court; (ii) the Mustang Project Companies' right to trial by jury in any proceedings so triable in this case or in any case, controversy, or proceeding related hereto; (iii) the Mustang Project Companies' right to have a United States District Court withdraw the reference in any proceeding subject to mandatory or discretionary withdrawal; or (iv) the Mustang Project Companies' rights, claims, actions, defenses, setoffs, or recoupments to which the Mustang Project Companies are or may be entitled under agreements, in law or in equity, all of which rights, claims, defenses, setoffs and recoupments that the Mustang Project Companies expressly reserve.

1 DATED: November 7, 2019

STOEL RIVES LLP

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3 /s/ Jennifer N. Slocum

4 Andrew H. Morton (*pro hac vice*)

Jennifer N. Slocum (*pro hac vice*)

5 *Attorneys for RE Mustang LLC, RE Mustang 3*
6 *LLC and RE Mustang 4 LLC*